

Clayton L. Everett
State Bar No. 24065212
NORRED LAW, PLLC
515 E. Border Street
Arlington, Texas 76010
Telephone: (817) 704-3984
clayton@norredlaw.com
Attorney for Michelle Dawn Ragsdale

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

In re:
Michelle Dawn Ragsdale,

Debtor,

Case No. 20-42137-elm
Chapter 13

**RESPONSE TO TRUSTEE'S NOTICE OF INTENT TO CERTIFY CHAPTER 13 CASE
FOR DISMISSAL IN FOURTEEN DAYS FOR PLAN PAYMENT DELINQUENCY**

TO THE HONORABLE EDWARD L. MORRIS, UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Michelle Dawn Ragsdale ("Debtor"), and files this *Response to Trustee's Notice of Intent to Certify Chapter 13 Case for Dismissal* ("Notice") (Doc. 48), and would respectfully show the Court as follows:

1. Debtor Michelle Ragsdale had been hospitalized since Monday, September 26, 2022, and was released on Sunday, October 9. Ms. Ragsdale suffered a prolonged Covid-19 illness for a second time.

2. Ms. Ragsdale is unusually susceptible to respiratory diseases which often cause her white blood cells to collapse, requiring hospitalization. Her doctor has given her permission to return to work on October 12, 2022.

3. The Debtor has fallen behind on her plan payments. According to the Trustee's Notice, the amount to bring all payments current is \$4,384.00.

4. The Debtor intends to make a \$2,192 payment to the trustee on October 14 and another payment on October 28, decreasing her delinquent balance to \$2,192.

5. In the meantime, the Debtor will seek to modify her mortgage through the Northern District of Texas loan modification program.

6. The combination of the Debtor's catch-up payments and proposed loan modification will result in a cure of any delinquency over the life of the plan. Therefore, the Debtor asks that the Trustee withdraw its Notice to allow time for the modification to be approved.

WHEREFORE, PREMISES CONSIDERED, Debtor asks the Court to deny the relief requested in the *Notice of Intent to Certify Chapter 13 Case for Dismissal* filed by Tim Truman. Debtor asks for general relief.

Respectfully submitted,

Norred Law, PLLC

By: /s/ Clayton L. Everett
Clayton L. Everett
Texas State Bar No. 24065212
clayton@norredlaw.com
515 E. Border Street
Arlington, Texas 76010
Telephone: (817) 704-3984
Counsel for Debtor

CERTIFICATE OF SERVICE

I hereby certify that I have this date served a true and correct copy of the foregoing via first class mail, proper postage affixed, or via ECF upon all those requesting notice under Local Bankruptcy Rule 2002-1(j).

Dated: October 10, 2022.

/s/ Clayton L. Everett
Clayton L. Everett